

**REMARKS**

The Applicant respectfully requests further examination and reconsideration in view of the above amendments and the arguments set forth fully below. Claims 1-51 were pending. Within the previous Office Action, Claims 1-51 have been rejected. By the above amendments, new Claims 52-54 have been added. Accordingly, Claims 1-54 are now pending.

**Claim Rejections Under 35 U.S.C. § 103:**

Within the previous Office Action, Claims 1, 5, 10, 11, 12, 16, 21, 41, 43, 44, 45, 47, 48 and 49 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over US Patent Application Publication No. 2003/0163467 (Cazier) in view of Alicia Awbrey and Reena Spektor "Apple Unveils New iPods" (Awbrey).

Cazier teaches a system that uses a sorting criteria and a sorting size to reorganize data. Specifically, Cazier teaches an image management system that can improve the organization and retrieval of image files by automatically creating sub-directories. [Cazier, ¶ 0002] The sub-directories for the storage of the image files would be created based on a sorting criteria and a sorting size. [Cazier, ¶ 0006] Cazier defines the sorting criteria to be GPS locations of where photos were taken with a digital camera. Cazier teaches a system where a GPS database is pre-loaded onto a camera and photos that are taken can have a street location in, for example, the state of Colorado or a landmark such as the Grand Canyon. [Cazier, ¶¶ 0012, 0013] This information is embedded into the image file and the information is used to sort the image files later by location or image file size. [Cazier, ¶ 0014] Cazier does not teach performing automatic content routing by file type.

Within the previous Office Action, in the Response to Arguments section, Cazier paragraph 0022 is cited in response to the argument that Cazier, Awbrey and their combination do not teach "automatic content routing by file type." The cited section of Cazier teaches:

In a preferred embodiment of the current invention, the images would be sorted automatically when the camera or storage device is connected to the computer. Unfortunately the user may already have directories on the computer that contain large numbers of unsorted image files. In one embodiment of the current invention, the user would be able to give an input path or directory to be used to locate the images to be sorted 102. This would allow the user to organize images already contained on their computer. Changing the input directory would also allow the user to specify new locations for images to be sorted when the user moves images to their computer from the camera in non-standard ways. In another

embodiment of the current invention, the user could specify a file extension, for example \*.jpg. When a file extension has been specified, only files ending in the extension would be sorted. [Cazier, ¶ 0022]

Cazier is solely focused on sorting a specified type of files (e.g. image files) based on certain criteria (e.g. date, location, people), but teaches nothing of sorting different types of files such as movie files versus music files versus image files. Furthermore, the reference to the .jpg extension in the cited section merely allows a user to limit the files to be sorted (e.g. only .jpg files). The language of the cited section specifically states, “[w]hen a file extension has been specified, only files ending in the extension would be sorted.” [Cazier, ¶ 0022] (emphasis added) This is not the same as sorting files based on their type. Thus, Cazier does not teach sorting based on the file type as is suggested by the previous Office Action.

Awbrey describes a music player, specifically the well known iPod, and its ability to sync with a computer and download libraries of mp3 music files. Awbrey also does not teach performing automatic content routing by file type. Accordingly, neither Cazier, Awbrey nor their combination teach performing automatic content routing by file type.

Within the previous Office Action, in the Response to Arguments section, it is also stated that Cazier teaches, “an apparatus which routes information based on file type to a device, in this case a camera routes files to an external computer memory sector, i.e. folder, which receives the different types of files types sorted by file extension, i.e. jpg; paragraphs [0003] [0006] and [0023].” [Office Action, Page 29] As described above, Cazier does not sort files based on file extension. A careful reading of Cazier shows that a user is only able to limit the files to be sorted, such as all .jpg files, thus the language, “only files ending in the extension would be sorted.” [Cazier, ¶ 0022] Furthermore, Cazier clearly teaches a one-to-one relationship with a user connecting a camera to a computer, not a device coupled to one or more devices where the digital information is sorted and sent to the devices based on the type of digital information. In Cazier, the images clearly go directly from the camera to the computer, regardless of the type of content. As described above, Aubrey teaches an iPod and its ability to sync with a computer. Again, this is a one-to-one relationship, and has nothing to do with the claimed invention of a controller coupled to a storage device to automatically sort and distribute the digital information based on the type to one or more secondary devices. In Aubrey, the music on the iPod goes directly from the iPod to the computer or vice versa, regardless of the type of content.

In contrast to the combined teachings of Cazier and Awbrey, the computing device of the present invention performs automatic content routing *by file type*. The computing device has a

central processing unit, a storage device, a display adapter, a main memory, a UPnP interface, all coupled together by a system bus. The storage device stores digital content downloaded from the server and a routing software application. The routing software automatically detects which secondary devices are coupled to the computing device and routes the digital content to the appropriate secondary device. The UPnP interface preferably operates according to the UPnP protocol and couples the computing device to the exemplary secondary devices. The combination of Cazier and Awbrey results in a camera having the ability to embed location information into image files and download them into a computer. The combination of Awbrey and Cazier do not teach a device which is able to route digital information to an appropriate secondary device based on *file type*.

The independent Claim 1 is directed to an apparatus for automatically routing digital information. The apparatus of Claim 1 comprises an interface coupled to receive downloaded digital information having a type, a storage device coupled to the interface to store the digital information, and a controller coupled to the storage device to automatically sort and distribute the digital information based on the type to one or more secondary devices. "Type" is understood to mean file type, e.g. .avi, .mp3, .jpg, among others. In sharp contrast, the combination of Cazier and Awbrey leads to an apparatus that is able to categorize *one type of file*, an image file, by where the images were taken, to one type of secondary device, a computer. Awbrey discloses that when a user is using a Mac, then Apple's iTunes software will automatically connect with an iPod, not with an appropriate device based on file type to be distributed. As described above, neither Cazier, Awbrey nor their combination teach automatically sorting and distributing digital information based on the type to one or more secondary devices. For at least these reasons, the independent Claim 1 is allowable over the teachings of Cazier, Awbrey and their combination.

Claims 5, 10-12 and 48 are dependent upon the independent Claim 1. As discussed above, the independent Claim 1 is allowable over the teachings of Cazier, Awbrey and their combination. Accordingly, Claims 5, 10-12 and 48 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 12 is directed to an apparatus for automatically routing digital information from a computing device to one or more secondary devices. The apparatus of Claim 12 comprises an interface coupled to receive downloaded digital information having a type, a storage device coupled to the interface to store the digital information, and a controller coupled to the storage device to automatically detect the one or more secondary devices, determine which type of digital information is routed to which secondary device, and distribute the digital

information to the one or more secondary devices based on the type. As discussed above, the combination of Cazier and Awbrey do not sort digital information by *file type*, but rather sorts *image* files by the location where the images were captured. Furthermore, the camera taught by Cazier *does not receive downloaded digital information having a type*. Rather, it generates digital image files and arranges them by location. Also, the software taught by Awbrey does not determine which digital information is to be sent to which secondary device, but rather links up *only* to a digital music player, specifically the iPod. As described above, neither Cazier, Awbrey nor their combination teach distributing the digital information to the one or more secondary devices based on the type. For at least these reasons, the independent Claim 12 is allowable over the teachings of Cazier, Awbrey and their combination.

Claims 16, 21 and 49 are dependent on the independent Claim 12. As discussed above, the independent Claim 12 is allowable over the teachings of Cazier, Awbrey and their combination. Accordingly, Claims 16, 21 and 49 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 41 is directed to a method for routing digital information from a computing device to one or more secondary devices. The method of Claim 41 comprises receiving the digital information having a type, automatically sorting the digital information based on the type, and *automatically distributing the digital information to a corresponding one or more of the secondary devices based on the type*. As mentioned previously, the combination of Cazier and Awbrey do not sort digital information by *file type*, but rather sorts *image* files by the location where the images were captured. Furthermore, the camera taught by Cazier *does not receive downloaded digital information having a type*. Rather, it generates digital image files and arranges them by location. Also, the software taught by Awbrey does not determine which digital information is to be sent to which secondary device, but rather links up *only* to a digital music player, specifically the iPod. As described above, neither Cazier, Awbrey nor their combination teach automatically sorting the digital information based on the type and automatically distributing the digital information to a corresponding one or more of the secondary devices based on the type. For at least these reasons, the independent Claim 41 is allowable over the teachings of Cazier, Awbrey and their combination.

Claims 43 and 44 are dependent upon the independent Claim 41. As discussed above, the independent Claim 41 is allowable over the teachings of Cazier, Awbrey and their combination. Accordingly, Claims 43 and 44 are both also allowable as being dependent upon an allowable base claim.

The independent Claim 45 is directed to a method for routing digital information from a computing device to one or more secondary devices. The method of Claim 45 comprises receiving the digital information having a type, automatically detecting the secondary devices, automatically sorting the digital information based on the type, and automatically distributing the digital information to a corresponding one or more of the secondary devices based on the type. As discussed above, neither Cazier, Awbrey nor their combination teach receiving digital information having a type and automatically distributing the digital information to a corresponding one or more of the secondary devices based on the type. Instead, both references teach a *single file type* (Cazier refers to image files and Awbrey refers to music files). For at least these reasons, the independent Claim 45 is allowable over the teachings of Cazier, Awbrey and their combination.

Claim 47 is dependent on the independent Claim 45. As discussed above, the independent Claim 45 is allowable over the teachings of Cazier, Awbrey and their combination. Accordingly, Claim 47 is also allowable as being dependent upon an allowable base claim.

Within the previous Office Action, Claims 3, 4, 14 and 15 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Cazier in view of Awbrey and further in view of U.S. Patent No. 7,043,477 to Mercer et al. (Mercer). Claims 3 and 4 are dependent on the independent Claim 1. Claims 14 and 15 are dependent on the independent Claim 12. As discussed above, the independent Claims 1 and 12 are both allowable over the teachings of Cazier, Awbrey and their combination. Accordingly, Claims 3, 4, 14 and 15 are all also allowable as being dependent upon an allowable base claim.

Within the previous Office Action, Claims 2, 6, 7, 8, 9, 13, 17, 18, 19, 20, 22, 23, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37, 40, 42, 46, 50 and 51 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Cazier in view of Awbrey and further in view of U.S. Patent No. 6,253,207 to Malek. (Malek). Claims 2, and 6-9 are dependent on the independent Claim 1. Claims 13 and 17-20 are dependent on the independent Claim 12. As discussed above, the independent Claims 1 and 12 are both allowable over the teachings of Cazier, Awbrey and their combination. Accordingly, Claims 2, 6-9, 13 and 17-20 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 22 is directed towards an apparatus for automatically routing digital media content from a computing device to one or more secondary devices. The apparatus of Claim 22 comprises an interface coupled to receive downloaded digital media content having a type, a storage device coupled to the interface to store the digital media content, and a

controller coupled to the storage device to automatically detect the one or more secondary devices, determine which type of media content is routed to which secondary device utilizing a routing table and distribute the digital media content to the one or more secondary devices based on the type. As discussed above, Cazier does not teach an apparatus for receiving downloaded digital media having a type. Also, the combination of Cazier and Awbrey do not teach routing of digital information by type to an appropriate secondary device. Malek teaches a method and apparatus for separately transporting each monomedia stream of a composite multimedia signal across a network, such as an ATM network. Malek generally teaches the transfer of packet information from one server to another. [Malek, col. 4, lines 6-27] Such packets are embedded with addresses to determine the destination, not routed automatically by a file type. Accordingly, neither Cazier, Awbrey, Malek nor their combination teaches any apparatus or method that routes digital information to an appropriate secondary device *by file type*. For at least these reasons, the independent Claim 22 is allowable over the teachings of Cazier, Awbrey, Malek and their combination.

Claims 23, 26-30 and 50 are dependent on the independent Claim 22. As discussed above, the independent Claim 22 is allowable over the teachings of Cazier, Awbrey, Malek and their combination. Accordingly, Claims 23, 26-30 and 50 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 31 is directed to a network of devices for automatically routing digital information. The network of Claim 31 comprises a server including digital information, a computing device coupled to the server for obtaining and *automatically distributing the digital information based on a type*, and one or more secondary devices coupled to the computing device for receiving the digital information from the computing device. As discussed above, neither Cazier, Awbrey, Malek nor their combination teach a controller that *automatically distributes* the digital information based on the type to one or more secondary devices. For at least these reasons, the independent Claim 31 is allowable over the teachings of Cazier, Awbrey, Malek and their combination.

Claims 32-34, 37, 40, and 51 are dependent upon the independent Claim 31. As discussed above, the independent Claim 31 is allowable over the teachings of Cazier, Awbrey, Malek and their combination. Accordingly, Claims 32-34, 37, 40, and 51 are all also allowable as being dependent upon an allowable base claim.

Claim 42 is dependent on the independent Claim 41. Claim 46 is dependent on the independent Claim 45. As discussed above, the independent Claims 41 and 45 are both

allowable over the teachings of Cazier, Awbrey and their combination. Accordingly, Claims 42 and 46 are both also allowable as being dependent upon an allowable base claim.

Within the previous Office Action, Claims 24, 25, 35, 36, 38 and 39 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Cazier, Awbrey, Malek and further in view of Mercer. Claims 24 and 25 are dependent on the independent Claim 22. Claims 35, 36, 38 and 39 are dependent on the independent Claim 31. As described above, the independent Claims 22 and 31 are both allowable over the teachings of Cazier, Awbrey, Malek and their combination. Accordingly, Claims 24, 25, 35, 36, 38 and 39 are all also allowable as being dependent upon an allowable base claim.

**New Claims:**

As described above, none of the cited references teach any apparatus or method that routes digital information to an appropriate secondary device by file type. Further, none of the cited references teach any apparatus or method that routes digital information comprising media content of different media types including music, video and data, to an appropriate secondary device by media file type.

The independent Claim 52 comprises an apparatus for automatically routing digital information comprising media content of different media types including music, video and data. The apparatus of Claim 52 comprises an interface coupled to receive downloaded digital information having a media type, a storage device coupled to the interface to store the digital information and a controller coupled to the storage device to automatically sort and distribute the digital information based on the media type to one or more secondary devices. As described above, none of the cited references teach any apparatus or method that routes digital information to an appropriate secondary device by file type. Further, none of the cited references teach any apparatus or method that routes digital information comprising media content of different media types including music, video and data, to an appropriate secondary device by media file type. For at least these reasons, the independent Claim 52 is allowable.

The independent Claim 53 comprises a method for routing digital information comprising media content of different media types including music, video and data, from a computing device to one or more secondary devices. The method of Claim 53 comprises receiving the digital information having a media type, automatically sorting the digital information based on the media type and automatically distributing the digital information to a corresponding one or more of the secondary devices based on the media type. As described above, none of the cited

references teach any apparatus or method that routes digital information to an appropriate secondary device by file type. Further, none of the cited references teach any apparatus or method that routes digital information comprising media content of different media types including music, video and data, to an appropriate secondary device by media file type. For at least these reasons, the independent Claim 53 is allowable.

The independent Claim 54 comprises an apparatus for automatically routing digital media content of different media types including music, video and data, from a computing device to one or more secondary devices. The apparatus of Claim 54 comprises an interface coupled to receive downloaded digital media content having a media type, a storage device coupled to the interface to store the digital media content and a controller coupled to the storage device to automatically detect the one or more secondary devices, determine which media type of media content is routed to which secondary device utilizing a routing table, the routing table comprising a media type column and a device column and distribute the digital media content to the one or more secondary devices based on the media type. As described above, none of the cited references teach any apparatus or method that routes digital information to an appropriate secondary device by file type. Further, none of the cited references teach any apparatus or method that routes digital information comprising media content of different media types including music, video and data, to an appropriate secondary device by media file type. For at least these reasons, the independent Claim 54 is allowable.

Applicants respectfully submit that the claims are in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, they are encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,  
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